UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Monroe Motor Cars, LLC

7:07-cv-11469

Plaintiff,

MOTION TO ADMIT COUNSEL

-against-

PRO HAC VICE

General Motors Corporation

Defendant.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for Southern and Eastern Districts of New York, I, Timothy J. McHugh, a member in good standing of the bar of this Court, hereby move of an Order allowing the admission pro hac vice of

Applicant's Name:

John J. O'Donnell

Firm Name:

Lavin, O'Neil, Ricci, Cedrone & DiSipio

Address:

190 North Independence Mall West

6th & Race Streets, Suite 500

City/State/Zip:

Philadelphia, Pennsylvania 19106

Phone Number:

(215) 351-7936

Fax Number:

(215) 351-3085

John J. O'Donnell is a member in good standing of the Bar of the State of Pennsylvania

There are no pending disciplinary proceedings against John J. O'Donnell in any State or Federal court.

Dated:

January 11, 2008

City, State:

New York, New York

USDC SDNY

Respectfu

Sponsor:

Timothy J. 1 **IcHugh**

SDNY Bar:

TM3393

Lavin, O'Neil, Ricci, Cedrone & DiSipio

Firm Name:

Address:

420 Lexington Avenue, Suite 2900

City/State/Zip: New York, New York 10170

Phone No:

(212) 319-6898

Fax No.:

(212) 319-6932

6580470 1/11/67

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Monroe Motor Cars, LLC Plaintiff, -against-General Motors Corporation Defendant. State of New York SS:

)

Count of New York

7:07-cv-11469

AFFIDAVIT OF TIMOTHY J. McHUGH IN SUPPORT OF MOTION TO ADMIT **COUNSEL PRO HAC VICE**

Timothy J. McHugh, being duly sworn and deposes and says as follows:

- I am a shareholder at Lavin, O'Neil, Ricci, Cedrone & DiSipio, counsel for Defendant, General 1. Motors Corporation in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit John J. O'Donnell as counsel pro hac vice to represent Defendant in this matter.
- I am a member in good standing of the bar of the (State of New York), and was admitted to 2. practice on April 26, 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- I have known John J. O'Donnell since 1998. 3.
- Mr. O'Donnell is a shareholder at Lavin, O'Neil, Ricci, Cedrone & DiSipio in Philadelphia, 4. Pennsylvania.
- I have found Mr. O'Donnell to be a skilled attorney and a person of integrity. He is experienced 5. in Federal practice and is familiar with the Federal Rules of Civil Procedure.
- Accordingly, I am pleased to move the admission of John J. O'Donnell, pro hac vice. 6.
- I respectfully submit a proposed order granting the admission of John J. O'Donnell, pro hac vice, 7. which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to acmit John J. O'Donnell, pro hac vice, represent Plaintiff in the above captioned matter, be granted.

Dated:

January 11, 2008

City, State:

New York, New York

Sworn to and subscribed

before me this _____ day

of January 2008

Notary Public

My Commission Expires:

Respectfully submitted

SDNY Bar Code: TM3393

ARTHUR F. DEL PRINCIPE Public State of New York No. 02DE6139458 Qualified in Bronx County

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Monroe Motor Cars, LLC

7:07-cv-11469

Plaintiff,

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

-against-

General Motors Corporation

Defendant.

Upon the motion of Timothy J. McHugh, attorney for Defendant, General Motors Corporation, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

John J. O'Donnell

Firm Name:

Lavin, O'Neil, Ricci, Cedrone & DiSipio

Address:

190 North Independence Mall West

6th & Race Streets, Suite 500

City/State/Zip:

Philadelphia, PA 19106

Telephone/Fax:

(215) 351-7936/(215) 351-3085

Email Address:

jodonnell@lavin-law.com

is admitted to practice pro hac vice as counsel for Defendant, General Motors Corporation, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City/State:

New York, New York

United States District/Magistrate Judge

UNITED	STATES	DISTRICT	COURT
SOUTHE	RN DIST	RICT OF	NEW YORK

Monroe Motor Cars, LLC

7:07-cv-11469

Plaintiff,

-against-

PROOF OF SERVICE

General Motors Corporation

Defendant.

The undersigned states that a copy of the foregoing Motion for Admission Pro Hac Vice of on behalf of defendant, General Motors Corporation, was served via Regular, First Class Mail on the date below upon the following:

Jed S. Freeman, Esquire
The Margolis Law Firm LLC
5 Becker Farm Road
P.O. Box 420
Roseland, New Jersey 07068
(973) 239-3000

Dated: January 11, 2008

New York, New York

LAVIN, O'NEIL, RICCI, CEDRONE & DISIPIO

By:_

Timothy J. McHugh

SDNY Bar No.: TM3393

420 Lexington Avenue, Suite 2900

Graybar Building

New York, New York, 10170

(212) 319-6898



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

John Joseph O'Donnell, Esq.

DATE OF ADMISSION

November 6, 1986

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.

Witness my hand and official seal Dated: January 9, 2008

Chief Clerk